



## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 21-1

March 4, 2021

Petition of Starlink Services, LLC for Designation as an Eligible Telecommunications Carrier.

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### FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO STARLINK SERVICES, LLC

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Starlink Services, LLC (“Starlink”) the following information requests:

#### Instructions

1. Each request should be answered in writing on a separate page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. This request should be treated as a rolling information request. Do not wait for all answers to be completed before supplying answers. Provide each answer to the Department as soon as it is available.
3. These requests shall be deemed continuing so as to require further supplemental responses if Starlink or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means: Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. The term “certify” means to provide a sworn certification by the appropriate corporate officer.
7. The term “Affiliate” means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, Starlink. For purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.
8. The term “person” includes an individual, partnership, association, joint-stock company, trust, or corporation.
9. The term “Starlink” includes Starlink and any Affiliate.
10. The term “RDOF” means the federal Rural Digital Opportunity Fund.
11. The term “ETC” means eligible telecommunications carrier.
12. The term “Petition” refers to Starlink’s application for ETC designation in the above-captioned proceeding.
13. The term “FCC” means the Federal Communications Commission.
14. The term “RDOF Census Blocks” means those census blocks listed in Exhibit 1 of the Petition.
15. If any one of these requests is ambiguous, notify the Department so that the request may be clarified prior to the preparation of a written response.
16. File the responses with Shonda D. Green, Secretary of the Department, not later than 5:00 P.M. on **March 18, 2021**.

### Requests

- D.T.C. 1-1 Please provide copies of all of the materials Starlink filed with the FCC as part of FCC Forms 183 (Short-Form Application) and 683 (Long-Form Application).
- D.T.C. 1-2 Identify any states where Starlink has been designated as an ETC. For each, state whether the designation is limited, and if so how, and include any specific requirements imposed on or volunteered by the ETC. Provide complete and detailed documentation describing any such limitations or requirements.
- D.T.C. 1-3 Identify any states that have denied a Starlink petition for ETC designation, and any states in which Starlink has withdrawn a petition for ETC designation.
- D.T.C. 1-4 Please provide the FCC-determined location counts for each of the RDOF Census Blocks, by both block and block group.
- D.T.C. 1-5 Describe Starlink's intended method for identifying serviceable locations in the RDOF Census Blocks and for reporting served locations into the High Cost Universal Broadband (HUBB) database.
- D.T.C. 1-6 Provide an organizational chart showing the employees or groups responsible for the following services:
- a. Starlink's Internet Service Provider Services.
  - b. Starlink's Network Operator Services.
  - c. Starlink's Customer Support Services.
- D.T.C. 1-7 Certify whether Starlink has any outstanding tax liabilities or other late payments or liabilities due and owing to the Commonwealth of Massachusetts or any government and/or any quasi-public entity in any other jurisdictions. If so, provide complete and detailed documentation identifying the amount(s) owed and explaining the reasons for such arrears.
- D.T.C. 1-8 Identify any and all ongoing litigation involving Starlink in any jurisdiction. Provide a docket number and summary of the litigation for each matter identified.
- D.T.C. 1-9 Certify whether the FCC, any state utilities commission, or any other government agency has rendered or entered a finding, criminal conviction (including plea agreements), or civil judgment against Starlink or any of its executive officers or senior managers during the last ten years. Provide a copy of any such finding, conviction, plea agreement, or civil judgment entered against or any of its executive officers or senior managers.
- D.T.C. 1-10 Referring to pages 5-6 of the Petition, please describe specifically how Starlink will provide service to 40 percent of the areas in Massachusetts for which it received RDOF funding within three years, and 20 percent of such areas each year

thereafter until 100 percent of such areas receive the required voice and broadband service by the end of Year 6.

- D.T.C. 1-11 Please describe Starlink’s plans for providing quality customer service in Massachusetts, including but not limited to:
- The number of employees in Starlink’s intended customer service operation.
  - The physical location of Starlink’s customer service staff.
  - Starlink’s internal standards for responding to and resolving customer inquiries and complaints (e.g., expected response times, manner of communication).
- D.T.C. 1-12 On page 4 of the Petition, Starlink mentions a current offering of “beta consumer-grade broadband service in Washington, Montana, Minnesota, Oregon, Michigan, Idaho, Wisconsin, Maine, and North Dakota.” Please specify:
- How many customers is Starlink currently serving in each state where it offers broadband service?
  - Available service plans, including information concerning bandwidth, pricing, costs (including recurring costs, one-time costs, and installation costs), contract terms, and service limitations (including whether Starlink imposes data caps).
  - What are the advertised and actual (median) download and upload speeds in each state? Please explain how Starlink calculates these metrics.
  - Does Starlink anticipate the existing beta program, including the information requested above, to be reflective of its proposed Massachusetts RDOF offering? If not, explain why.
- D.T.C. 1-13 Identify all states and any countries other than the United States in which Starlink offers telecommunications services.
- D.T.C. 1-14 Identify any communities in Massachusetts in which Starlink currently offers voice or broadband services. In addition, please identify the number of Massachusetts residents that have signed up for Starlink’s beta broadband program identified on page 4 of the Petition, and when it expects begin providing service under the program in Massachusetts.
- D.T.C. 1-15 As referenced on page 4 of the Petition, please clarify (a) what, if any, ground equipment Starlink will need to place in Massachusetts to enable its broadband service, (b) whether any such equipment has already been placed, and (c) the location or planned location of such equipment.
- D.T.C. 1-16 Please describe Starlink’s capacity to respond to problems with its satellite, ground (i.e., gateway sites), and customer equipment, and how quickly Starlink anticipates being able to repair these problems.
- D.T.C. 1-17 Identify and describe the non-Lifeline broadband and voice plans Starlink plans to offer in the RDOF Census Blocks, including information on bandwidth, pricing,

costs (including recurring costs, one-time costs, and installation costs), contract terms, and service limitations (including whether Starlink intends to impose data caps for Massachusetts customers).

- D.T.C. 1-18 On page 9 of the Petition, Starlink notes that it will offer the supported (RDOF) services using its own facilities or a combination of its own facilities and resale of another carrier's service. Please explain this statement, including how Starlink will balance the use of its own facilities and the resale of another carrier's service.
- D.T.C. 1-19 Provide Starlink's service outage reporting and restoration plans for its RDOF Census Blocks, identifying any staff or contractors responsible for service restoration in the RDOF Census Blocks.
- D.T.C. 1-20 Please submit any network management statements (or other documents with information regarding the network management practices, performance characteristics, and commercial terms of Starlink's broadband internet access service) Starlink has created pursuant to 47 C.F.R. § 8.1(a) or otherwise, and identify how such documents can be accessed by the public.
- D.T.C. 1-21 On page 10 of the Petition, Starlink notes that it is considering providing voice services through a Managed Service Provider (MSP). Please provide an update on whether Starlink will use an MSP or deliver voice service by alternative means. If Starlink will use an MSP, please explain whether Starlink has identified and contracted with an MSP(s) for Massachusetts customers.
- D.T.C. 1-22 Regardless of the answer to D.T.C. 1-21, please confirm that Starlink will deliver voice service using its own facilities and explain whether customers who subscribe to the voice service will be required to purchase or rent additional equipment. Please also explain whether Starlink intends to deliver voice service in the same manner to other states.
- D.T.C. 1-23 Please explain how Starlink intends to assess and remit E911 surcharges in accordance with Massachusetts E911 regulations for each customer whose communication services are capable of accessing and utilizing the enhanced 911 system.
- D.T.C. 1-24 On page 14 of the Petition, Starlink states that its services will remain functional in emergency situations. At the system level, the Petition states that it "will be able to reroute traffic around damaged facilities, and will be able to manage traffic spikes resulting from emergency situations."
- a. Please explain whether this is already the case with existing Starlink customers.
  - b. Please disclose the number of outages Starlink broadband customers have experienced during 2020 and 2021, and the average duration of the outages.

- D.T.C. 1-25 On page 14 of the Petition, Starlink notes that, with regard to building redundancies into its network, “every user will have multiple satellites in view with which it can communicate” and “every satellite will have multiple gateway sites in view with which it can communicate.” Within the RDOF census blocks covering the Commonwealth of Massachusetts, please describe:
- a. How many satellites will Massachusetts users have in view, with which the users can communicate?
  - b. How many gateway sites will each Massachusetts satellite have in view, with which the satellite can communicate?
- D.T.C. 1-26 On page 13 of the Petition, Starlink states it will provide Lifeline to qualifying low-income consumers and publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. Please provide more details on Starlink’s planned Lifeline offering(s) in Massachusetts, including:
- a. The manner in which Starlink will identify consumers likely to qualify for Lifeline service.
  - b. The advertising channels that Starlink will use to reach consumers identified as likely to qualify for Lifeline service.
  - c. What marketing materials Starlink is developing in order to advertise Lifeline service.
  - d. Starlink’s voice and broadband Lifeline service offering(s) in Massachusetts, including bandwidth, pricing, contract terms, service limitations, and any promotional rates Starlink plans to offer.